

# DORSEY & WHITNEY

A Partnership Including Professional Corporations

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445 MINNESOTA STREET  
ST. PAUL, MINNESOTA 55101  
(612) 227-8017

P. O. BOX 848  
340 FIRST NATIONAL BANK BUILDING  
ROCHESTER, MINNESOTA 55903  
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WAYZATA, MINNESOTA 55391  
(612) 475-0373

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8 THIRD STREET NORTH  
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WASHINGTON, D. C. 20036  
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30 RUE LA BOÉTIE  
75008 PARIS, FRANCE  
011 331 562 32 50

March 27, 1984

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1600 TCF Tower  
Minneapolis, Minnesota 55402

Gentlemen:

Enclosed and hereby served upon you please find  
the Supplemental Response of Reilly Tar & Chemical Corpor-  
ation to Interrogatory No. 4 of the City of St. Louis  
Park (Dated May 18, 1983).

Very truly yours,

Edward J. Schwartzbauer

EJS:jbn

Enclosure

cc: Robert Leininger, Esquire  
Paul Zerby, Esquire

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

UNITED STATES OF AMERICA,

Civil No. 4-80-469

Plaintiff,

and

STATE OF MINNESOTA, by its  
Attorney General Hubert H.  
Humphrey, III, its Department  
of Health, and its Pollution  
Control Agency,

Plaintiff-Intervenor

vs.

REILLY TAR & CHEMICAL CORPORATION;  
HOUSING AND REDEVELOPMENT AUTHORITY  
OF ST. LOUIS PARK; OAK PARK VILLAGE  
ASSOCIATES; RUSTIC OAKS CONDOMINIUM,  
INC.; and PHILLIP'S INVESTMENT CO.,

Defendants,

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION,

Defendant,

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

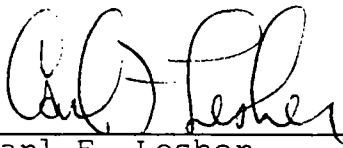
SUPPLEMENTAL RESPONSE  
OF REILLY TAR & CHEMI-  
CAL CORPORATION TO  
INTERROGATORY NO. 4 OF  
THE CITY OF ST. LOUIS  
PARK (DATED MAY 18, 1983)

Reilly Tar & Chemical Corporation ("Reilly")  
hereby supplements its response to Interrogatory No. 4  
of the City of St. Louis Park (dated May 18, 1983) to also  
include the following:

As stated in Reilly's original answer, because  
discovery and trial preparation are still not complete,  
a complete answer to this interrogatory cannot be given  
at this time. As an additional partial response, however,  
see the factual discussions in the Memorandum of Reilly  
Tar & Chemical Corporation in Opposition to the United  
States' and State of Minnesota's Joint Motion for Partial  
Summary Judgment on Defendant Reilly Tar & Chemical Corpora-  
tion's Fourth Affirmative Defense to the United States'  
Complaint and Fifth Affirmative Defense to the State's  
Complaint (Unconstitutionality of CERCLA), and the affida-  
vits submitted in support thereof.

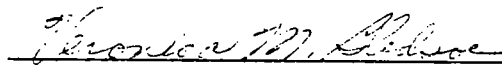
Dated: March 22, 1984.

REILLY TAR & CHEMICAL CORPORATION

By   
Carl F. Leshner,  
Vice President

STATE OF INDIANA )  
 )  
COUNTY OF MARION )

Sworn and subscribed to before me a Notary Public this 22 day of March, 1984.

  
VERONICA M. BLEDSOE

MY COMMISSION EXPIRES JANUARY 29, 1986